



# RCRA Compliance Inspection Report

## Flint Hills Resources Alaska, LLC

Anchorage, AK

AKD 98098 7499

September 23, 2014

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U.S. Environmental Protection Agency  
Office of Compliance and Enforcement  
Inspection and Enforcement Management Unit  
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jones.jon@epa.gov

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Report Date

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Peer Review Signature

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Date

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Peer Review Signature

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Date

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### **Attachments**

- A. Aerial photos
- B. Photo Log and CD containing all photos taken during the inspection
- C. Waste Stream Table
- D. 2011 & 2013 Biennial Reports
- E. Analytical Results:
  - Carbon Drums & Waste Water – 4/11/2012
  - Spent sand blast media from Tank 4217 – 5/19/2014
  - Water, sludge, filter material, and sand blast media – 7/16/2014
- F. Job Descriptions & Training
- G. Contingency Plan distribution letters 1/29/2014
- H. Updated Contingency Plan, distribution letters and CD 10/16/2014
- I. Flint Hills Port of Anchorage Site Report

### **Disclaimer**

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

## **Section A: Basic Facility and Inspection Information**

### Facility Information

Handler Name: Flint Hills Resources Alaska, LLC

Handler ID Number: AKD 98098 7499

Facility Contact/Title: Ms. Serena Lewellyn, Environmental Coordinator

Facility Location Address: 1076 Ocean Dock Road, Anchorage, AK 99501

Facility Mailing Address: Same as above

Contact Phone Number: (907) 490-6217

Contact Email Address: serena.lewellyn@fhr.com

GPS Coordinates of Site: Lat: 61.23011  
Long: -149.8909

### Inspection Information

Inspection Type: RCRA Compliance Evaluation Inspection (CEI)

Inspection Date: September 23, 2014

Arrival Time: 0903 hours

Departure Time: 1435 hours

Inspection Team: Jon Jones, EPA

## **Section B: General Facility Information**

### Owner/Operator Information

Owner: Alaska Railroad Corporation  
327 West Ship Creek Avenue  
Anchorage, AK 99501

Operator: Flint Hills Resources Alaska, LLC  
1076 Ocean Dock Road  
Anchorage, AK 99501

### Site Location

Flint Hills Resources Alaska, LLC (FHR or facility) is located in an industrial area at the Port of Anchorage in Anchorage, AK. The facility is not on tribal land or tribally owned. I reviewed data for the site on the R10 EJSCREEN: Basic Review Map Tool and saw Flint Hills Resources Alaska, LLC is located in an Environmental Justice area. Aerial photos of the facility were obtained from the internet prior to the inspection and from the facility during the inspection and are included as Attachment A.

### Background and Activities

The following information was obtained from Mr. Glen Rosenhamer, Environmental Manager Terminal Operations, Mr. Pat Hallett, Terminal Manager, and Mr. Rob Dayley, Maintenance Manager during the opening meeting of the inspection. The facility is a Fuel Terminal and has operated at its present location since the 1960's. Unocal built the site and owned it through the 1980's. It was then purchased by Mapco and in 1997 Williams Alaska Petroleum, Inc. bought the operation. In 2004 Williams Alaska Petroleum, Inc. sold the operation to Flint Hills Resources. The facility has 13 employees and operates 24 hours a day, seven days a week, 365 day a year running two 12 hour shifts from 6 am to 6 pm and 6pm to 6 am. The Anchorage terminal facility can store more than 700,000 barrels of gasoline, diesel, and jet fuel. A pipeline system extends from the facility one-half mile to the Port of Anchorage and enables bulk fuel transfers to and from other terminals and vessels berthed at the municipality's petroleum, oil, and lubricants docks.

## **Section C: Regulatory Information**

### Compliance History

According to RCRAinfo Flint Hills Resources Alaska, LLC first notified as a hazardous waste generator in 2004 and was last inspected by EPA on September 12, 2007 and no violations were identified during that inspection.

### Regulatory Status

The facility is listed in RCRAinfo as a Large Quantity Generator (LQG). Based on the amount of waste observed onsite the facility was a Small Quantity Generator (SQG); however, Ms. Lewellyn, the facility point-of-contact, told me that the FHR terminal had been a LQG of hazardous waste since April of 2014. The facility is classified under NAICS Code 424710 (Petroleum Bulk Stations and Terminals).

### Site Hazardous Waste Information

The hazardous waste observed during the inspection was used jet fuel filters contaminated with benzene (D018), waste aerosols (D001, D003), and waste lab chemicals (D001). A waste stream table listing wastes generated at the facility is included as Attachment C. A copy of the facility's 2011 Biennial Report and a 2013 Site Identification Form indicating that the FHR terminal was a SQG during 2013 is included as Attachment D.

## **Section D: Description of Inspection**

### Purpose of Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection. The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273), and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for FY 2014.

### Inspection Entry and Opening Conference

The inspection was an unannounced inspection. I arrived at the facility at 0903 hours on September 23, 2014. I entered the Administration office building and went to the information desk in the lobby. There was no receptionist, so I went to a nearby office and identified myself to a gentleman who introduced himself as Mr. Pat Hallett, Terminal Manager. I explained that I was there to conduct a hazardous waste compliance inspection. Mr. Hallett asked me to take a seat in their conference room while he gathered the appropriate people. After additional people arrived, I began an opening conference. The following personnel were in attendance during the opening conference.

Mr. Rob Dawley, Maintenance Manager

Mr. Glen Rosenhamer, Environmental Manager Terminal Operations



Mr. Pat Hallett, Terminal Manager  
Mr. Tom Green, FHR – North Pole Terminal – Environmental Compliance Engineer  
Mr. Jared Hendrix, Environmental Engineer, Entry Level Professional  
Mr. Steve Fernandez, Operations Manager North Pole Refinery (Telephone)  
Ms. Serena Lewellyn, Environmental Coordinator (Telephone)

Mr. Rosenhamer explained that he was up from Minnesota conducting some training with some of the new FHR personnel in Alaska. I gave everyone a business card, presented my credentials, and explained the purpose of my visit. During the opening conference, Mr. Hallett told me about the waste streams that were generated at the terminal. He said they contracted with PSC for waste pick-ups and currently shipped all of their waste to Burlington Environmental down in Kent, WA. I told Mr. Hallett that the information I had from the previous notification, dated 2006, indicated that FHR was a LQG of hazardous waste. I asked Mr. Hallett what size of generator he thought his facility currently was and he said that he wasn't sure. Ms. Lewellyn spoke up on the telephone and said that the facility had been a LQG since April of 2014 due to a spill that occurred at the facility. She said that the facility was a SQG during 2013 and the first part of 2014. Ms. Lewellyn told me that on April 19, 2014 there was a spill at the Fuel Rack located at the East Tank Farm. Following the inspection, I obtained the Flint Hills Port of Anchorage Site Report from ADEC's Contaminated Sites database (Attachment I). According to the report approximately 4,273 gallons of gasoline spilled onto approximately 5,500 square feet of soil when an in-line filter that supplied gasoline to a truck failed.

I explained what paperwork I wanted to see while at the facility and suggested that maybe someone could gather the paperwork I wanted to review while I conducted the walk through portion of the inspection. Mr. Hallett asked Messer's Hendrix and Green to pull all of the requested paperwork. I was accompanied during the inspection by Messer's Hallett, Dawley, and Rosenhamer.

#### Inspection Summary

I began the inspection of the facility. During the inspection I looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. I looked for wastes that facility representatives had not yet identified or designated as hazardous. I also observed the facility's universal waste management. Specifically, I inspected the following areas of the facility and observed the waste indicated in parentheses:

- < 90-day Central Hazardous Waste Accumulation Area (waste jet fuel filters (D018), waste sand blast media – pending analysis, waste aerosol cans (D001, D003))
- Lab waste Satellite Accumulation Area (waste lab chemicals consisting of petro ether, iso octane, and 2,2 dimethyl butane (D001))
- UOSS Tent (waste aerosol cans (D001, D003))
- Shop (waste aerosol cans (D001, D003), Non-PCB light ballasts, and waste fluorescent lamps managed as universal waste)

Only those areas in which I observed potential compliance concerns or noted other pertinent issues are discussed in this inspection report. No compliance concerns or pertinent issues were observed during the walk through portion of the inspection. When I returned to the office, the following paperwork was reviewed.

- Hazardous waste manifests (3 yrs.)
- LDR's (3 yrs.)
- Biennial reports for 2011 and 2013
- Contingency Plan
- Weekly inspections
- Analytical data (Attachment E)
- Training records (Attachment F)

- Job titles/descriptions related to hazardous waste management (Attachment F)

During the paperwork review, while reviewing the facility contingency plan, I saw that the plan did not describe actions that facility personnel were required to take in response to any releases of hazardous waste.

While reviewing the contingency plan I also saw that the plan had not been submitted to local police, fire department and hospitals.

#### Closing Conference

Following the paperwork review, I held a closing conference to discuss the findings of my inspection. The following personnel were in attendance during the closing conference.

Mr. Rob Dawley, Maintenance Manager

Mr. Glen Rosenhamer, Environmental Manager Terminal Operations

Mr. Pat Hallett, Terminal Manager

Mr. Tom Green, FHR – North Pole Terminal – Environmental Compliance Engineer

Mr. Jared Hendrix, Environmental Engineer, Entry Level Professional

Ms. Serena Lewellyn, Environmental Coordinator (Telephone)

I told Ms. Lewellyn that I did not observe any potential compliance concerns during my walk through inspection; however, I shared the following compliance concerns identified during my paperwork review.

- The Contingency Plan (C-Plan) did not describe the actions facility personnel were required to take in response to releases of hazardous waste at the facility.
- A copy of the C-Plan was not submitted to local police departments, fire departments, and hospitals. I received documentation during the inspection that indicates the facility C-Plan was only submitted to ADEC, AK DNR, AK Dept. of Fish and Game, and the Coast Guard (Attachment G).

I thanked everyone for their time and cooperation during the inspection and I departed the facility at 1435 hours.

Following the inspection, I received documentation from the facility that was received in the AOO on October 20, 2014 (Attachment H). This documentation included an updated hazardous waste contingency plan, an electronic version on cd, and copies of letters indicating distribution of the plan to the Anchorage Fire Department, LEPC – Anchorage, Anchorage Police Department, Providence Alaska Medical Center, CISPRI, Emerald Alaska, Inc., and State of Alaska Division of Homeland Security & Emergency Management.



**From:** Jones, Jon  
**Sent time:** 03/23/2015 05:12:00 PM  
**To:** Williams, Cheryl B.  
**Cc:** Jiles, Jordana; Ogle, Kimberly  
**Subject:** Flint Hills Resources Alaska, LLC AKD 98098 7499  
**Attachments:** Flint Hills Resources AK, LLC 1st DRAFT.docx ATTACHMENTS.pdf

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The 1<sup>st</sup> DRAFT along with attachments and photos is also located in the following location.  
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*Jon Jones*

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